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**FILED**

**SEP - 1 2022**

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities*  
7 *Commission and the California Office of Energy Infrastructure Safety*

10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION,

15 -and-

16 PACIFIC GAS AND ELECTRIC  
17 COMPANY,

18 Debtors.

- 19 ☐ Affects PG&E Corporation  
20 ☐ Affects Pacific Gas and Electric Company  
21 ☒ Affects both Debtors

22 \* All papers shall be filed in the lead case,  
23 No. 19-30088 (DM)

Bankr. Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administrated)

**DECLARATION OF WILLIAM B. ABRAMS IN SUPPORT OF MOTION OF WILLIAM B. ABRAMS FOR RECONSIDERATION AND RELATED RELIEF FROM THE ORDER GRANTING MOTION OF THE FIRE VICTIM TRUSTEE TO FILE REDACTED VERSIONS OF CERTAIN RETENTION AGREEMENTS UNTIL LITIGATION RELATED TO SUCH RETENTION AGREEMENTS IS FINALLY RESOLVED AND PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 59(e)**

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,  
2 hereby declare under penalty of perjury that the following is true and correct to the best of my  
3 knowledge, information, and belief:

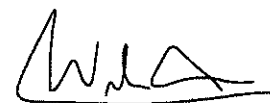
4 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a  
5 Pro Se party to promote and collaborate with core parties in good-faith towards a plan, PG&E Fire  
6 Victim Trust Agreement and to ensure prudent Trust oversight that provides just settlements for all  
7 claimants as well as adequate restructuring for Pacific Gas and Electric Corporation so our  
8 communities are safe from the growing risks of utility-caused wildfires.

9 2. I submit this declaration in support of this "MOTION OF WILLIAM B. ABRAMS  
10 FOR RECONSIDERATION AND RELATED RELIEF FROM THE ORDER GRANTING  
11 MOTION OF THE FIRE VICTIM TRUSTEE TO FILE REDACTED VERSIONS OF CERTAIN  
12 RETENTION AGREEMENTS UNTIL LITIGATION RELATED TO SUCH RETENTION  
13 AGREEMENTS IS FINALLY RESOLVED AND PURSUANT TO FEDERAL RULE OF CIVIL  
14 PROCEDURE 59(e)" (the "**Motion**") filed concurrently herewith.

15 3. After the PG&E Fires of 2017, I felt compelled to engage as a party to certain  
16 proceedings at the California Public Utilities Commission to work collaboratively towards solutions  
17 that address wildfire mitigation and other utility/energy issues. Some of these proceedings are related  
18 to this case. All of my filed comments are in the public record through the Commission's website.  
19 As an intervenor in these proceedings, I have received some compensation from Investor Owned  
20 Utilities including Pacific Gas and Electric Company. I have no financial interests in this case that  
21 are adverse to those of victims. I have no litigation financing or lines of credit tied to PG&E  
22 shareholders, bondholders or any other party in this case. I have not and do not intend to get any  
23 compensation for my involvement in this case other than through my claim and those claims of my  
24 family through the PG&E Fire Victim Trust. I have not engaged in activities to undermine the value  
25 of the Fire Victim Trust or to slow the Trust administration process.

26 4. The "Exhibit A" attached to the Motion is a true and correct copy of the email  
27 correspondence between myself and Trustee Counsel. I felt compelled to file this email exchange  
28 given the characterization of these communications by the Trustee within the "*Motion of the Fire  
Victim Trustee to File Redacted Versions of Certain Retention Agreements Until Litigation Related to  
Such Retention Agreements is Finally Resolved*" (the "**Trustee Motion**") [Dkt. 12871].

5. I declare under penalty of perjury that, to the best of my knowledge and after  
reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Santa  
Rosa, California on September 1, 2022.



William B. Abrams  
Pro Se Claimant